RAYMOND AND RAYMOND

ATTORNEYS AT LAW

7 GLENWOOD AVENUE, 4th FLOOR, STE. 408 EAST ORANGE, NEW JERSEY 07017

TELEPHONE: (973) 675-5622
TELEFAX: (408) 519-6711
EMAIL: herbertraymond@gmail.com

September 29, 2020

Honorable Vincent Papalia, U.S.B.J. U.S. Bankruptcy Court 50 Walnut Street, 3rd Floor Newark, NJ 07102

Re: Francis Avella

18-30162 Chapter 13

Proceeding: Select Portfolio Servicing's Default

Certification

Hearing Date: To Be Determined

Dear Judge Papalia:

Please accept this letter in opposition to the above matter. My office has preliminarily discussed the matter with the debtor's family but have been unable to thus far prepare a formal opposition. We have been advised that debtor has been extremely ill and in the hospital for some time now. While debtor disputes the accuracy of the pay history he has been unable due to his condition to provide additional proofs of payments or to substantively discuss the matter with my office at this time.

I would therefore request that the court mark the matter as contested, with the intension of a formal opposition being filed shortly.

Respectfully Submitted,

/s/ HERBERT B. RAYMOND, ESQ.

Herbert B. Raymond, Esq.